# STATE OF SOUTH CAROLINA State Budget and Control Board OFFICE OF GENERAL COUNSEL

MARK SANFORD, CHAIRMA GOVERNOR

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POST OFFICE BOX 11608 COLUMBIA. SOUTH CAROLINA 29211 (803) 734-1261

October 12, 2007

HUGH K. LEATHERMAN, SR. CHAIRMAN, SENATE FINANCE COMMITTEE

DANIEL T. "DAN" COOPER CHAIRMAN, WAYS AND MEANS COMMITTEE

FRANK W. FUSCO EXECUTIVE DIRECTOR



Charles Terreni, Esquire Chief Clerk Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

Re: Application of Chem-Nuclear Systems
SCPSC Docket No. 2000-366-A
Discovery Request of the South Carolina Budget and Control Board

Dear Mr. Terreni:

Enclosed please find the original and one (1) copy of the Discovery Request of the South Carolina Budget and Control Board in the above matter. It would be greatly appreciated if you would file the original and clock-in and return the additional copy in the self-addressed stamped envelope provided. Thank you for your assistance in this matter. Should there be any questions or comments, please do not hesitate to contact me.

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Sincerely,

Derrick K. McFarland
Office of General Counsel

**Enclosure** 

cc: Robert T. Bockman, Esquire

## STATE OF SOUTH CAROLINA BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION DOCKET NO. 2000-366-A

IN THE MATTER OF:	)	DISCOVERY REQUEST OF
A 1' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '	)	THE SOUTH CAROLINA BUDGET
Application of Chem-Nuclear Systems,	)	AND CONTROL BOARD
LLC, a Subsidiary of EnergySolutions.	)	DATED OCTOBER 12, 2007

### TO: THE APPLICANT AND ITS COUNSEL, ROBERT T. BOCKMAN, ESQUIRE

Pursuant to the South Carolina Public Service Commission's ("the Commission") Rules of Practice and Procedure and the South Carolina Rules of Civil Procedure, the South Carolina Budget and Control Board ("the Board") hereby serves three (3) copies of these discovery requests upon the Applicant (Chem-Nuclear Systems, LLC or CNS) and files the original and one (1) copy of these discovery requests with the Honorable G. O'Neal Hamilton, Chairman of the Commission.

#### **INSTRUCTIONS**

- A. All information shall be provided to the undersigned in the format as requested.
- B. All responses to the below requests shall be labeled using the same numbers as used herein.
- C. If the requested information is found in other places or in other exhibits, reference should not be made to those, but, instead, the information should be reproduced and placed in the Interrogatory response in the appropriate sequence.
- D. The requested information should be bound in ring binders (loose leaf notebook) or otherwise bound.
- E. In addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) responsible for the information contained in each answer should be indicated with each response.
- F. Each of the discovery requests should be reproduced at the beginning of each of the responses.
- G. If the response to any Interrogatory is that the information is not currently available, Applicant should state when the information will be available.
- H. The Interrogatories shall be deemed continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.

I. Responses are due not more than 10 days after the service of these requests

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#### **INTERROGATORIES**

- 1. In Exhibit A to the CNS Application, fixed cost proposed adjustment for fiscal year 2007 G&A is increased from \$1,245,272, the amount identified in Commission Order No. 2007-418, to \$2,731,782. Please provide an explanation for the adjustment of \$1,486,510, including:
  - a. A breakdown of the requested \$2,731,782 G&A costs for fiscal year 2007 into the individual components and sub-components which total the final amount.
  - b. The amount attributable to each component and sub-component.
  - c. A detailed description of the methodology used from which each component and sub-component is allocated across the various business units of the company.

#### REQUEST TO PRODUCE

- 1. Please produce any documents mentioned in any of the above interrogatories or referred to in any response to an interrogatory.
- 2. Please produce any document used in responding or developing information in which to respond to any of the above interrogatories.

Derrick K. McFarland

OFFICE OF GENERAL COUNSEL

State Budget and Control Board

1201 Main Street, Suite 800

Post Office Box 11608

Columbia, South Carolina 29211

(803) 734-1261

Attorneys for the S.C. Budget and Control Board

October 12, 2007

#### STATE OF SOUTH CAROLINA

## BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION

#### **DOCKET NO. 2000-366-A**

IN THE MATTER OF:	)		in.		130		
Application of Chem-Nuclear Systems, LLC, a Division of Duratek, Inc., for Identification of Allowable Costs	) ) )	CERTIFICATE OF SERV	ICE	EO	ĒΙV	TE.	1

I, Renee' Larsen, an employee of the South Carolina Budget and Control Board, Office of General Counsel, do hereby certify that I have this day served copies of the DISCOVERY REQUEST OF THE SOUTH CAROLINA BUDGET AND CONTROL BOARD on the Plaintiff by causing same to be deposited in the United States mail, postage pre-paid, and addressed as follows:

Robert T. Bockman, Esqire (Via US Mail) McNair Law Firm Post Office Box 11390 Columbia, SC 29211 Counsel for Chem-Nuclear Systems, LLC

The Hon. Henry D. McMaster (Via US Mail) Attorney General State of South Carolina Post Office Box 11549 Columbia, SC 29211 S.C. Consumer Advocate (Via US Mail) Philip S. Porter S.C. Dept. of Consumer Affairs Post office Box 5757 Columbia, SC 29250

Catherine D. Taylor, Esquire SCANA Services, Inc. Legal Department 130 Columbia, SC 29218

The Hon. C. Earl Hunter, Commission (Via US Mail) S.C. Dept. of Health and Environmental Control 2600 Bull Street Columbia, SC 29201

Renee'/Larsen

Columbia, South Carolina October 12, 2007